

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

JEROME JOHNSON,

Plaintiff,

vs.

BOARD OF POLICE  
COMMISSIONERS, et al.,

Defendants.

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Cause No. 4:06-CV-605 CDP

**PLAINTIFF'S LIST OF WITNESSES AND EXHIBITS**

Comes now plaintiff, through counsel, and provides the following disclosure of  
witnesses and exhibits to be used in the trial of this matter:

Witnesses

Plaintiff intends to present the following witnesses:

1. Brian Gilmore, SLMPD;
2. Jesse Harris, SLMPD;
3. Daniel Drago, SLMPD;
4. Mathias Hanewinkel, SLMPD;
5. Clyde Bailey, SLMPD;
6. Jerald Barnes, SLMPD;
7. Ronald Henderson, SLMPD;
8. Michael Ball;
9. Kelly Vincent;
10. Jerome Johnson;
11. Rena Johnson;

12. Freddie Upchurch;
13. David Glaser, M.D.;
14. Barry Jones, M.D.;
15. Romie Kopf, Director of Security, Barnes-Jewish Hospital;
16. Adrienne Bergh, SLMPD;
17. Robert Boney, SLMPD;
18. Ryan Cousins, SLMPD;
19. Levaughn Smart, SLMPD;
20. Daniel Diemer, Attorney At Law;
21. Mike Worley.

Plaintiff may present the following witnesses if the need arises:

1. Mark Oman, SLMPD;
2. Lt. Col. Reggie L. Harris, SLMPD;
3. Larry Kleinkemper, Webster Groves Police Department, 4 S Elm Ave., Webster Groves, MO 63119. Phone: (314) 963-5402;
4. Michael Politte, SLMPD;
5. John Clobes, SLMPD;
6. Raymond Oberschelp, SLMPD;
7. Dennis Conway, SLMPD;
8. Kim Castro, SLMPD;
9. Stacy Davis;
10. Evidence custodian – St. Louis City Sheriff's Department;
11. Property custodian – St. Louis City Metropolitan Police Department;

12. Records Custodian – St. Louis Metropolitan Police Department, regarding Computer Aided Dispatch records.

13. Joseph Mokwa, SLMPD;

14. Thomas Carroll, SLMPD.

Plaintiff intends to present the testimony of the following witnesses by deposition:

1. David Glaser, M.D. Plaintiff hopes to present Dr. Glaser's testimony live but reserves the right to do so by deposition if need be.

Plaintiff intends to present the following documents/exhibits at trial:

1. St. Louis Metropolitan Police Department Complaint # 01042489, and supplements thereto\*;
2. Laboratory Reports # 1 – 5 of St. Louis Metropolitan Police Department Complaint # 01042489, Laboratory # 01-003779\*;
3. St. Louis Metropolitan Police Department Evidence Technicians Report #01-42510, and supplements thereto\*;
4. St. Louis Metropolitan Police Department Evidence Technicians Report #01-42549, and supplements thereto\*;
5. Internal Affairs report, IA# 01-100D-5\*;
6. Photographs of Jerome Johnson's injuries;
7. Photographs of scene and vehicles taken by SLMPD Evidence Technicians referenced in ET reports # 01-42510 and 42549\*;
8. Enlarged aerial photographs of scene and surrounding areas;
9. Enlarged street maps of scene and surrounding areas;
10. Handwritten statement of Gary Micheau;
11. Clothing worn by Jerome Johnson on 4/3/01;

12. .22 caliber RG Industries revolver recovered at shooting scene;
13. Audio tapes and transcripts of 911 calls on 4/3/01\*(tapes only);
14. Audio tapes and transcripts of police communications on 4/3/01\*(tapes only);
15. SLMPD Policy & Procedures, #91-S-13; #92-S-12 § I – IV; & 93-S-3\*.
16. Medical records;
17. Medical bills;

Plaintiff intends to present the following documents/exhibits if the need arises:

1. Firearm Trace report for .22 caliber revolver\*
2. Handwritten statement of Brian Gilmore\*;
3. Typed statements of Adrienne Bergh; Robert Boney; Levaughn Smart; Ryan Cousins; Dan Drago; Jesse Harris;
4. Line-up form and photograph of Adrian Baker\*;
5. Letter from Board of Police Commissioners accepting recommendations contained in IA report # 01-100D-5\*;
6. Computer Assisted Dispatch (CAD) records for 4/3/01\*;
7. 5/20/02 letter from SLMPD to Daniel Diemer re: CAD records;
8. SLMPD Policy & Procedures Rule 7, “Complaint and Disciplinary Procedures\*.”
9. Transcript of Trial in State v. Jerome Johnson, Cause No. 011-03873;
10. Transcript of deposition of defendant Ryan Cousins in State vs. Jerome Johnson, Cause No. 011-03873;
11. Transcript of deposition of defendant LaVaughn Smart in State vs. Jerome Johnson, Cause No. 011-03873;

12. Transcript of deposition of defendant Robert Boney in State vs. Jerome Johnson, Cause No. 011-03873;

13. Transcript of deposition of defendant Daniel Drago in State vs. Jerome Johnson, Cause No. 011-03873.

14. Handwritten statement of Anna Biondolillo, SLMPD\*;

15. Handwritten statement of Michael Sisco and Jeremy Stockman, SLMPD\*;

16. Handwritten statement of Renwick Bovell\*;

17. Handwritten statement of Jesse Harris, Jr., SLMPD\*;

18. Metropolitan Police Department Juvenile Detention Affidavit re: Jerome Johnson\*;

19. St. Louis Metropolitan Police Department Internal Chain of Custody Reports, items 1 through 17; and laboratory case number LAB-01-003779, item no. 006-6-6-1\*;

20. SLMPD Crime Laboratory Notes re: Case No. LAB-01-003779, report no. 004\*;

21. SLMPD Evidence Submission Receipt re: LAB-01-003779\*,

22. Medical records of Jerome Johnson from Correctional Medical Services\*.

The exhibits marked with an \* were provided to plaintiff by defendants (including the Board of Police Commissioners).

Respectfully submitted,

THE COCHRAN FIRM-ST. LOUIS  
COCHRAN, CHERRY, GIVENS,  
SMITH, CALDWELL & SINGLETON,  
L.L.C.

/s/ Worsham N. Caldwell, Jr.  
Worsham N. Caldwell, Jr., # 521852  
The Cochran Firm  
1010 Market Street, Suite 1540  
St. Louis, MO 63104  
Office: (314) 421-0077  
Fax: (314) 421-5377

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was served via facsimile and U.S. Mail, first class, postage prepaid, this 27th day of December, 2007, on the following.

Joshua N. Worthington  
Assistant Attorney General  
Old Post Office  
815 Olive Street, Suite 200  
St. Louis, MO 63101  
*Attorneys for Board of Police Commissioners,  
State of Missouri,  
Adrienne Bergh, Robert Boney,  
Ryan Cousins, Levaughn Smart*

/s/ Worsham N. Caldwell, Jr.